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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AFT LOCAL 2121; PALOMAR FACULTY
FEDERATION, AFT LOCAL 6161;
MENDOCINO COLLEGE FEDERATION OF
TEACHERS, AFT LOCAL 6322; AND SAN
JOSE-EVERGREEN FEDERATION OF
TEACHERS, AFT LOCAL 6157, ON BEHALF
OF THEMSELVES AND THEIR MEMBERS
TO THE EXTENT PERMITTED BY
GOVERNMENT CODE SECTION 3543.8;
CALIFORNIA FEDERATION OF
TEACHERS, ALISA MESSER; TIM
KILLIKELLY; KAREN SAGINOR;
SHANNON LIENHART; SHANELL
WILLIAMS; AUGUSTA GOLDSTEIN,

Plaintiffs,

vs.

ACCREDITING COMMISSION FOR
COMMUNITY AND JUNIOR COLLEGES, *et*
al.,

Defendants.

Case No. 3:16-cv-03411 HSG

**JOINT STIPULATION REGARDING
ENLARGEMENT OF BRIEFS ON
DEFENDANT ACCJC'S MOTION TO
DISMISS PLAINTIFFS' SECOND
AMENDED COMPLAINT; ~~PROPOSED~~
ORDER**

STIPULATION

Pursuant to Local Rules 7-11 and 7-12 of the Northern District of California, Defendant Accrediting Commission for Community and Junior Colleges ("ACCJC") and Plaintiffs AFT Local 2121; Palomar Faculty Federation, AFT Local 6161, Mendocino College Federation of Teachers, AFT Local 6322, San Jose-Evergreen Federation of Teachers, AFT Local 6157, California Federation of Teachers, Alisa Messer, Tim Killikelly, Karen Saginor, Shannon Lienhart, Shanell Williams, and Augusta Goldstein ("Plaintiffs") respectfully stipulate as follows:

WHEREAS, Plaintiff filed its Second Amended Complaint in this action on November 4, 2016 (D.I. 57, the "SAC");

WHEREAS, Defendant ACCJC currently has up to and including December 5, 2016 to answer, move, and/or otherwise respond to the SAC;

WHEREAS, the SAC is voluminous, asserting seven separate causes of action and including

326 numbered paragraphs on 76 pages;

WHEREAS, Defendant has indicated that it will move to dismiss all seven causes of action in the SAC;

THEREFORE, IT IS HEREBY STIPULATED by and between the parties, and through their respective attorneys of record and subject to order of the Court, as follows:

- (1) ACCJC may file a memorandum of points and authorities not to exceed 30 pages in support of a motion to dismiss Plaintiffs' Second Amended Complaint.
- (2) Plaintiffs may file a memorandum of points and authorities not to exceed 30 pages in opposition to ACCJC's motion to dismiss Plaintiffs' Second Amended Complaint.
- (3) ACCJC may file a reply memorandum of points and authorities not to exceed 20 pages in further support of its motion to dismiss Plaintiffs' Second Amended Complaint.

IT IS SO STIPULATED, THOROUGH COUNSEL OF RECORD.

Dated: November 8, 2016

KELLER, SLOAN, ROMAN & HOLLAND LLP

By: /s/ Kenneth E. Keller

KENNETH E. KELLER

Attorneys for Defendant Accrediting Commission
for Community and Junior Colleges

Dated: November 8, 2016

ALTSHULER BERZON LLP

By: /s/ Eileen B. Goldsmith

EILEEN B. GOLDSMITH

Attorneys for Plaintiffs

CIVIL L.R. 5-1(i) ATTESTATION

I, Kenneth E. Keller, hereby attest that I have been authorized by Eileen B. Goldsmith, counsel for Plaintiffs, to execute on her behalf this Joint Stipulation Regarding Enlargement of Briefs on Defendant ACCJC's Motion to Dismiss Plaintiffs' Second Amended Complaint.

Dated: November 8, 2016

/s/ Kenneth E. Keller
Kenneth E. Keller

~~PROPOSED~~ ORDER

As stipulated and agreed to by the Parties, ACCJC may file a memorandum of points and authorities not to exceed 30 pages in support of a motion to dismiss Plaintiffs' Second Amended Complaint; Plaintiffs may file a memorandum of points and authorities not to exceed 30 pages in opposition to ACCJC's motion to dismiss Plaintiffs' Second Amended Complaint; and ACCJC may file a reply memorandum of points and authorities not to exceed 20 pages in further support of its motion to dismiss Plaintiffs' Second Amended Complaint.

IT IS SO ORDERED.

Dated: November 10, 2016

